UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE MUNICIPAL DERIVATIVES ANTITRUST LITIGATION

MDL No. 1950

Master Docket No. 08-02516 (VM) (GWG)

THIS DOCUMENT RELATES TO:

NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENTS WITH REMAINING SIX

DEFENDANTS

ALL ACTIONS

CLASS ACTION

PLEASE TAKE NOTICE that Class Plaintiffs will move this Court before the Honorable Victor Marrero, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl St., New York, NY 10007, for an order in support of the Plaintiffs' request for preliminary approval of settlement with the remaining six defendants, as set forth in the attached Proposed Order.

In support of the motion, Class Plaintiffs will rely upon the accompanying memorandum of law, the declaration of Megan Jones attached thereto, and other written or oral argument as may be requested or permitted by the Court.

Dated: New York, New York February 23, 2016

1

By: Seth D. Ard

William A. Isaacson Jonathan M. Shaw Scott E. Gant BOIES, SCHILLER & FLEXNER LLP 5301 Wisconsin Ave. NW, Suite 800 Washington, DC 20015

Telephone: (202) 237-2727 Facsimile: (202) 237-6131

William C. Carmody Arun Subramanian Seth D. Ard SUSMAN GODFREY L.L.P.* 560 Lexington Avenue, 15th Floor New York, NY 10022-6828 Telephone: (212) 336-8330 Facsimile: (212) 336-8340

Michael D. Hausfeld Megan E. Jones HAUSFELD LLP 1700 K Street NW, Suite 650 Washington, DC 20006 Telephone: (202) 540-7201 Facsimile: (202) 540-7201

Jordan Connors SUSMAN GODFREY L.L.P. 1201 Third Ave., Suite 3800 Seattle, WA 98101

Telephone: (206) 516-3814 Facsimile: (206) 516-3883 Marc M. Seltzer SUSMAN GODFREY L.L.P. 1901 Ave. of the Stars, Suite 950 Los Angeles, CA 90067-6029 Telephone: (310) 789-3100 Facsimile: (310) 789-3150

Class Plaintiffs' Co-Lead Counsel